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Process Management

February 5, 2004

Mr. Nabil S. Fayoumi
U. S. Environmental Protection Agency - Region 5
Superfund Division
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Suspension of Work
Groundwater Migration Control System
Sauget Area 2 – Sites O, Q, R and S
Sauget, Illinois

Dear Mr. Fayoumi:

This letter is sent pursuant to paragraph 85, Section XIX of the September 30, 2002 UAO, which requires the respondents to notify EPA of any delay or anticipated delay in the project.

As we discussed in our weekly construction conference call on February 3, 2004, the slurry wall construction will be suspended until at least March 1, 2004 due to the wintry weather conditions in the St. Louis area. The cold, wet and icy weather has prevented work for the past 9 work days and we expect these adverse weather conditions to continue for the next 10 days based on the extended weather forecast. In order to preserve resources that are being lost because of unproductive time, work will be suspended until the long term weather conditions improve. Site costs are currently in the range of $130k - $150k per week just to keep equipment and staffing available daily. Costs can be reduced to $50k-$60k per week during work suspension without impacting the ability to complete the work when the weather improves.

During the suspension, slurry levels and thus stability of the slurry trench will be maintained and stormwater will continue to be controlled and managed. The major equipment required to complete the slurry wall will remain on site. The Liebherr 843 crane with KS 3000 clamshell bucket will be demobilized immediately. This crane is rented from Soletanche and will not be needed to complete construction. Most of the small equipment, i.e. dozers, short stick track hoes, trucks etc, will be demobilized. Most of the workforce will be furloughed. A minimum crew will be on site 3-5 days per week for slurry maintenance and stormwater control. The Construction Management

contractor, URS will be on site Monday-Friday. The GMCS pumping system will continue to operate to control groundwater levels.

When the weather is determined to be suitable for the productive resumption of work, the equipment and workforce can be remobilized. If funding is available to complete the entire slurry wall, it is expected to take at least 36 weeks to complete excavation and backfill, cover the spoils and demobilize. This is based on the contractor's (Inquip's) production rates to date and the substantial amount of rock anticipated at the north end of the site. Other technologies will be reviewed to determine if shorter construction time is possible.

If you have any questions, please call me.

Sincerely,

Gary W. Vandiver
Project Coordinator

cc. Sandra Bron - IEPA
Richard Williams
Peter Barrett – CH2M Hill
Tom Martin - USEPA
Ken Bardo - USEPA
Bruce Yare – Solutia
Cathy Bumb - Solutia
Steve Smith - Solutia